

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Timmie Lewis

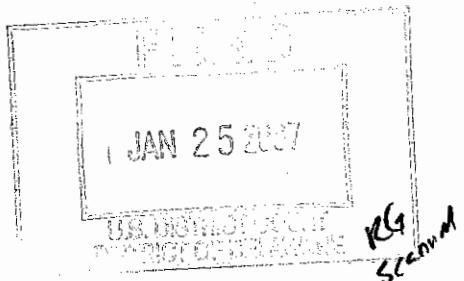
v.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL.

MOTION FOR ORDER OF DEFENDANT
DR. SYLVIA FOSTER'S CONTEMPT
OF COURT ORDER DATED SEPT 27, 06,
FOR DELIBERATELY REFUSING TO
RESPOND TO THE PLAINTIFF'S MOTION(S)
FOR ADMISSION

DATE: 1/22/07



Jimmie Lewis
SBI #506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

- 1.) ON SEPT 27, 06 THIS HONORABLE COURT FINDING GOOD CAUSE SHOWN, GRANTED THE DEFENDANT DR. SYLVIA FOSTER'S SEPT 26, 06, DI.82 MOTION FOR PROTECTIVE ORDER, WITH THE CLAUSE THAT THE DEFENDANT SHALL RESPOND TO DISCOVERY, INTERROGATORY AND REQUEST FOR ADMISSION PROPERLY FILED BY THE PLAINTIFF WITHIN THE DISCOVERY PERIOD PREVIOUSLY SET FORTH BY THIS COURT'S SCHEDULING ORDER DATED JULY 28, 06.
- 2.) THE SEPT 27, 06 ORDER WAS RENDERED DUE TO THE DEFENDANT'S MOTION FOR PROTECTIVE ORDER'S TO PREVENT THE PLAINTIFF FROM DEPOSING THE DEFENDANTS AS WELL AS WITNESSES.
- 3.) THE PLAINTIFF HAS GIVEN REASONABLE NOTICE BY WAY OF PROPERLY FILING MOTIONS FOR ADMISSIONS #'S I AND II, BUT THE DEFENDANT DR. FOSTER REFUSES TO ADHERE.

4.) THE DEFENDANTS ACTIONS DEFINE
DELIBERATE INDIFFERENCE TOWARDS THE
PLAINTIFF'S PLIGHT, AS WELL AS A TOTAL
DISREGARD TO THIS HONORABLE COURT

1ST, 6TH AND 14TH U.S.C.A RIGHT
VIOLATION, (CONTEMPT OF SEPT 27, 06
COURT ORDER).

5.) THE PLAINTIFF HEREBY REQUEST
THIS HONORABLE COURT TO IMPOSE
A PUNITIVE MONETARY SANCTION
OF UP TO \$75,000.00; TO BE
PROVIDED TO THE PLAINTIFF.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 22ND, DAY OF,
JAN, 2007, THAT I DID MAIL ONE TRUE
AND CORRECT COPY OF THE PLAINTIFF'S MOTION
FOR ORDER OF DR. SYLVIA FOSTER'S CONTEMPT
OF COURT ORDER DATED SEPT 27, 06 FOR
DELIBERATELY REFUSING TO RESPOND TO
THE PLAINTIFF'S MOTION(S) FOR ADMISSION,
BY U. S POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (6ms)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

LOUIS J. RIZZO JR
1001 JEFFERSON PLAZA
SUITE 202
WILMINGTON, DELAWARE 19801

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